

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**ROBERT DOUGLAS HARTMAN,**

Defendant.

**ROBERT DOUGLAS HARTMAN,** )  
 )  
Defendant. )

COMES NOW, Defendant Robert Douglas Hartman, by and through counsel, and for his Unopposed Motion for Additional Time and to Continue Evidentiary Hearing states as follows:

1. This Court previously scheduled an Evidentiary Hearing for all pre-trial motions on August 21, 2007.
2. Defendant is advised that voluminous discovery materials are available for inspection and review at the office of the United States Attorney, and is in the process of arranging to review the same. It is anticipated, that a thorough review of the discovery materials will require a substantial amount of time.
3. While Defendant has filed some pre-trial motions, it is anticipated that after a review of the discovery materials, additional motions may be filed.
4. Accordingly, Defendant requests that he be granted an additional forty-five (45) days, up to and including October 5, 2007, in which to file pre-trial motions, and that this matter be rescheduled for a status conference after all pre-trial motions have been filed.
5. Counsel for Plaintiff does not oppose the granting of this motion.

WHEREFORE, Defendant prays this Court grant his Unopposed Motion for Additional Time and to Continue Evidentiary Hearing.

Respectfully submitted,

/s/Burton H. Shostak

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Attorneys for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of August, 2007, a true and correct copy of the foregoing was electronically filed with Clerk of the Court to be served by operation of the Court's CM/ECF electronic filing system upon the following:

**Howard J. Marcus**

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usamoe.crimdock@usdoj.gov

/s/Burton H. Shostak